

1 CLEMENT SETH ROBERTS (SBN 209203)
croberts@orrick.com
2 BAS DE BLANK (SBN 191487)
basdeblank@orrick.com
3 ALYSSA CARIDIS (SBN 260103)
acaridis@orrick.com
4 ORRICK, HERRINGTON & SUTCLIFFE LLP
The Orrick Building
5 405 Howard Street
San Francisco, CA 94105-2669
6 Telephone: +1 415 773 5700
Facsimile: +1 415 773 5759
7
8 SEAN M. SULLIVAN (pro hac vice)
sullivan@ls3ip.com
9 MICHAEL P. BOYEA (pro hac vice)
boyea@ls3ip.com
COLE RICHTER (pro hac vice)
10 richter@ls3ip.com
LEE SULLIVAN SHEA & SMITH LLP
11 656 W Randolph St., Floor 5W
Chicago, IL 60661
12 Telephone: +1 312 754 0002
Facsimile: +1 312 754 0003
13
14 *Attorneys for Sonos, Inc.*

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA,
17 SAN FRANCISCO DIVISION

18
19 GOOGLE LLC,
20 Plaintiff and Counter-defendant,
21 v.
22 SONOS, INC.,
23 Defendant and Counter-claimant.
24

Case No. 3:20-cv-06754-WHA
Related to Case No. 3:21-cv-07559-WHA

**SONOS, INC.'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED RE ITS REPLY
IN SUPPORT OF MOTION TO STRIKE
PORTIONS OF GOOGLE'S EXPERT
INVALIDITY AND
NONINFRINGEMENT REPORTS**

25
26
27
28

1 **I. INTRODUCTION**

2 Pursuant to Civil Local Rule 79-5(f), Sonos, Inc. (“Sonos”) hereby respectfully submits
 3 this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed
 4 (“Administrative Motion”) in connection with Sonos, Inc.’s Reply in Support of Motion to Strike
 5 Portions of Google’s Expert Invalidity and Noninfringement Reports (“Sonos’s Reply”).
 6 Specifically, Sonos seeks to file under seal the information and/or document(s) listed below:

DOCUMENT	PORTIONS TO BE SEALED	DESIGNATING PARTY¹
Sonos’s Reply	Portions highlighted in blue	Google
Exhibit Y to the Declaration of Geoffrey Moss in Support of Reply (“Decl. of Moss”)	Entire Document	Google
Exhibit Y to the Declaration of Geoffrey Moss in Support of Reply (“Decl. of Moss”)	Portions in red boxes	Google and Sonos
Exhibit AA to Decl. of Moss	Entire Document	Google

15 **II. LEGAL STANDARD**

16 Materials and documents may be provisionally filed under seal pursuant to Civil Local
 17 Rule 79-5(f) when the document, or portions thereof, “has been designated as confidential by
 18 another party or non-party.” *See L.R. 79-5(f).*

19 **III. GOOGLE LLC’S CONFIDENTIAL INFORMATION**

20 Sonos seeks to seal the information and/or document(s) listed in the above table because
 21 they may contain information that Google considers Confidential and/or Highly Confidential-
 22 Attorneys’ Eyes Only and/or Highly Confidential-Source Code pursuant to the Protective Order
 23 entered by this Court. Dkt. 92. Except as noted in note 1, below, Sonos takes no position on the
 24 merits of sealing Google’s designated material, and expects Google to file one or more
 25 declarations in accordance with the Local Rules.

26
 27 ¹ With respect to the information and/or documents identified in the table, which contain
 28 confidential material designated by both parties, Sonos is concurrently filing an administrative
 motion to seal the same information on its *own* behalf.

IV. CONCLUSION

In compliance with Civil Local Rule 79-5(d) and (e), unredacted versions of the above-listed documents accompany this Administrative Motion and redacted versions are filed publicly. A proposed order is being filed concurrently herewith. For the foregoing reasons, Sonos respectfully requests that the Court grant Sonos's Administrative Motion.

Dated: February 17, 2023

ORRICK HERRINGTON & SUTCLIFFE LLP
and
LEE SULLIVAN SHEA & SMITH LLP

By: /s/ Clement S. Roberts
Clement Seth Roberts

Attorneys for Sonos, Inc.